

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-2(c)**

Robert Manchel, Esq.  
1 Eves Drive, Suite 111  
Marlton, NJ 08053  
Attorney for Debtors  
RM-1141

In Re:

John C. and Denise D. Bartholomew

Case No. 17-35995KCF

Judge:

Chapter 13

**CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO**

**X CREDITOR'S MOTION or CERTIFICATION OF DEFAULT**

**TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT**

The debtors in the above-captioned chapter 13 proceeding hereby object to the following (choose one):

1. X Motion for Relief from the Automatic Stay filed by Colonial Savings, FA, creditor. A hearing has been scheduled for February 13, 2019, at 9:00 a.m.

OR

       Motion to Dismiss filed by the Standing Chapter 13 Trustee. A hearing has been scheduled for        at        a.m.

OR

       Certification of Default filed by                         , creditor. We are requesting that a hearing be scheduled on this matter.

OR

       Certification of Default filed by Standing Chapter 13 Trustee. We are requesting that a hearing be scheduled on this matter.

2. We are objecting to the above for the following reasons (**choose one**):

Payments have been made in the amount of \$\_\_\_\_\_, but have not been accounted for. Documentation in support is attached hereto.

Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

Other: We will make a payment of \$4,000 by January 31, 2019. We wish to resume regular mortgage payments as of February 2019 and capitalize the balance of the arrears through our Chapter 13 bankruptcy plan. We respectfully request the court deny the movant's request for relief & allow us to continue with our bankruptcy plan.

3. This certification is being made in an effort to resolve the issues raised by the creditor in its motion.

4. We certify under penalty of perjury that the foregoing is true and correct.

Date: 1/4/2019

/s/ John C. Bartholomew  
John C. Bartholomew, debtor

Date: 1/4/2019

/s/ Denise D. Bartholomew  
Denise D. Bartholomew, debtor